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1309 West 15th Street, Suite 303 Plano, Texas 75075-7248 (214) 424-4833 Fax (214) 424-4099

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

March 29, 1993

BY HAND

Ms. Donna R. Searcy Secretary Federal Communications Commission 1919 M Street, N.W., Room 222 Washington, D.C. 20554

Re: PP Docket No. 93-21
Sports Migration Inquiry

Dear Ms. Searcy:

Transmitted on behalf of The Southland Conference are an original and nine copies of the its Comments in the above-referenced proceeding. We would appreciate your assistance in distributing a personal copy of The Southland Conference's Comments to each Commissioner.

Thank you for your assistance in this matter.

Very truly yours,

Willard S. Belknap

Commissioner

Enclosures

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OFFICE OF THE SECRETARY

Before The FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Matter of)
Implementation of Section 26 of the Cable Television Consumer Protection and Competition Act of 1992) PP Docket No. 93-21))
Inquiry into Sports Programming Migration	,)))

COMMENTS OF THE SOUTHLAND CONFERENCE

The Southland Conference ("Conference") submits
these comments in response to the Commission's Notice of Inquiry
("Notice") in this proceeding. Home Sports Entertainment ("HSE")
provides cable coverage of certain sports events featuring Conference teams, and ESPN has provided coverage of the Conference
men's basketball tournament. The Conference has been unable to
obtain broadcast television coverage of these or other events
featuring Conference teams.

The Notice states that the Commission intends to focus on professional sports and college football and basketball.

Notice at ¶5. It also seeks information about cable carriage of sports "programming that otherwise would not have been transmitted via video at all," and specifically questions whether the public is "better served by the current mix [of broadcast and

cable sports programming] than it was before?" Id. at ¶30. If not for HSE and ESPN, television viewers in this area would not have the opportunity to see sports events involving Conference teams.

The Southland Conference is comprised of the following universities: McNeese State University; Nicholls State University; University of North Texas; Northeast Louisiana State University; Northwestern State (Louisiana) University; Sam Houston State University; Southwest Texas State University; Stephen F. Austin University; University of Texas -- Arlington; and University of Texas -- San Antonio. Broadcast television stations generally have not been interested in televising sports events featuring Conference teams, presumably because the Conference is not as widely recognized as other collegiate sports conferences and stations do not anticipate sufficient advertising revenues to support coverage of Conference games. However, in each of the past two years, HSE has provided live coverage of four Conference football games as well as the Conference women's basketball tournament. In addition, HSE has carried several Conference men's basketball games and one women's volleyball game. Finally, the men's Conference basketball tournament has been covered by ESPN. Thus, HSE and ESPN have provided the only real television exposure for Conference teams.

Because broadcast television stations and networks have not expressed interest in televising the Conference games carried

on HSE and ESPN, or any of the numerous other Conference football and men's and women's Conference basketball games, there has been no "migration" of Conference sports events from broadcast television to cable. Rather, there has been an expansion of sports programming through cable carriage. Moreover, in spite of the cable coverage described above, numerous Conference sporting events remain available for carriage by local broadcasters. Consequently, the Conference member schools and television viewers interested in Conference events are better off with the "current mix" of broadcast and cable sports events because at least some Conference games which would not otherwise be available to viewers over broadcast television are available on HSE and ESPN.

March 29, 1993

Respectfully submitted,

THE SOUTHLAND CONFERENCE

